REMARKS

Claims 1-18 were originally presented in the subject application. Claim 19 was added in a Response to Office Action dated August 18, 2004, claim 20 was added in a Response to Office Action dated December 23, 2004, and claims 1-2, 4-5 and 7-20 were amended in an Amendment and Response to Office Action dated November 3, 2005. No claims have herein been amended, added or canceled. Therefore, claims 1-20 remain in this case.

Applicant respectfully requests entry of these remarks, and reconsideration and withdrawal of the sole remaining ground of rejection.

35 U.S.C. §102(e) Rejection

The Office Action rejected claims 1-20 under 35 U.S.C. §102(e), as allegedly anticipated by Martenson (U.S. Patent No. 6,219,708). Applicant respectfully, but most strenuously, traverses this rejection.

With respect to an anticipation rejection, it is well settled that a claimed invention is not anticipated unless a single prior art reference discloses: (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as the claimed invention; (4) in order to perform the identical function of the claimed invention. In this instance, Applicant submits that Martenson fails to disclose at least one element of each of the independent claims and as a result does not anticipate, or even render obvious, Applicant's invention.

Claim 1 recites a remote control system. The system comprises a terminal device having a control program, and a server coupled to the terminal device. The server is configured to transmit control data to the control program for controlling the terminal device and register three-dimensional model data representing the terminal device. The system further comprises a client coupled to the server, the client configured to receive and render the three-dimensional model data and to transmit to the server update data for the three-dimensional model data, the update data reflecting an operation on the terminal device. The server is further configured to receive

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the update data and transmit, in response to receiving the update data, corresponding operation control data to the control program in order to effect remote control of the terminal device by the client.

Against the aspect of the sever being configured to register three-dimensional model data representing the terminal device, the Office Action cites to Martenson at column 4, lines 28-33, the "updated options." As noted in Martenson at column 4, lines 15-16, the options are associated with operations to perform at the network resource. However, nowhere in the cited section does Martenson disclose three-dimensional model data representing a terminal device, as claimed. The "view" referenced in Martenson at column 4, line 32 is simply a refreshed listing of the updated options and has nothing whatever to do with registering three-dimensional model data representing a terminal device.

Similarly, against the claim 1 aspect of a client being configured to, among other things, receive and render the three-dimensional model data, the Office Action cites to column 4, lines 30-33 of Martenson. However, as remarked above, this section simply refers to a refreshed listing of the updated options. There is no disclosure, teaching or suggestion in the cited section of a client (or anything else) rendering three-dimensional model data.

Further, while Martenson mentions VRML for viewing the system, Applicant respectfully submits that simply viewing something in 3D is not the same as remotely controlling a terminal device via updating three-dimensional model data representing the terminal device, as claimed. Any remote control in Martenson is done via the two-dimensional list of options presented to the user, and not by updating any modeling data representing the device being controlled, let alone three-dimensional model data. The mechanism used for remote control is simply different, and mentioning VRML for viewing the system alone is simply not enough.

Therefore, Applicant submits that claim 1 cannot be anticipated by, or made obvious over, Martenson.

Claims 4, 11, 15, 17 and 18 each contain an aspect of three-dimensional model data representing a terminal device. Thus, the remarks made above with respect to claim 1 apply

equally to those claims. Therefore, Applicant submits that none of claims 4, 11, 15, 17 or 18 can be anticipated by, or made obvious over, Martenson.

Applicant submits that the dependent claims are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For example, claim 2 recites that the control program of the terminal device interprets the operation control data for the operation of the terminal device, and transmits, to the server, control data for reflecting the operating results for the operation.

Against claim 2, the final Office Action cites to Martenson at column 4, lines 28-32. However, the cited section of Martenson simply discloses that the options database is updated, with no further details. There is no disclosure regarding the options database update being done as a result of anything, much less as a result a control program at a network resource sending control data, for example.

Therefore, Applicant submits that claim 2 cannot be anticipated by, or made obvious over, Martenson.

Claim 3 recites that, based on the control data received from the terminal device, the server adjusts the three-dimensional model data to reflect the current state of the terminal device, and transmits the resultant three-dimensional model data to the client.

Against claim 3, the final Office Action cites to Martenson at column 4, lines 30-33. However, Applicant submits that updating options in a two-dimensional list is simply not the same as adjusting three-dimensional model data to reflect the current state of the terminal device, as claimed.

Therefore, Applicant submits that claim 3 cannot be anticipated by, or made obvious over, Martenson.

Claim 19 recites that a second client is coupled to the server, for employing a web browser to designate a URL for the three-dimensional model data, and for downloading the three-dimensional model data so as to share the three-dimensional model data with the client. Claim 19 further recites that the server comprises a module for recording an operation performed by a user as an operation event and for replaying, as needed, the operation event. Claim 19 depends from claim, which recites that the operation is reflected by updating three-dimensional model data. Therefore, the server is recording three-dimensional model data for replaying.

Against the second client/sharing aspect of claim 19, the final Office Action cites to Martenson at column 1, line 66 to column 2, line 13. However, looking beyond the first sentence of the cited section, it is clear that it speaks only to a single client controlling given network resource. As quoted below, it is clear that multiple clients sharing control over a given resource is not disclosed, as it appears the final Office Action seems to allege. There simply is no second client or three-dimensional model data sharing disclosed in Martenson:

> In one embodiment, clients perform platform independent network management using existing browser software. This embodiment enables **a client** to perform network management without the requirement of learning a specialized network management protocol or language.

> In one embodiment, **a client** directly manages a network resource using any TCP/IP network by selecting specialized options using existing browser software. For instance, in an HTML environment a network resource is managed using an existing browser, such as NETSCAPE NAVIGATOR, MICROSOFT INTERNET EXPLORER, NCSA MOSAIC, or any HTTP-compatible browser. According to one embodiment, the network resource is programmed with a network module having an options database which provides one or more options to **a client** as **it** accesses the network resource.

Against the recording/replaying module, the final Office Action cites to data and fault logs disclose in Martenson. The final Office Action also alleges at the bottom of page 9 that "Replaying said operation event is the viewing the logs." However, Applicant submits that viewing a two-dimensional log is simply not the same as replaying an operation on a terminal

device, much less doing so with three-dimensional model data (the operation is recited in claim 1 as updating three-dimensional model data).

Therefore, Applicant submits that claim 19 cannot be anticipated by, or made obvious over, Martenson.

Claim 4 recites a server-client system, comprising a server, in which are stored three-dimensional model data in a Java program file, the three-dimensional model data representing a terminal device coupled to the server, and a program for controlling the terminal device. The system further comprises a first client connected to the server via a network, for calling, displaying and updating the three-dimensional model data; and a second client connected to the server via the network, for employing a web browser to designate a URL for the three-dimensional model data, and for downloading and displaying the three-dimensional model data received from the server so as to share the three-dimensional model data with the first client.

Against the second client aspect of claim 4, the final Office Action cites to Martenson at column 1, line 66 to column 2, line 3. However, looking beyond the first sentence of the cited section, it is clear that it speaks only to a client (singular) controlling given network resource. As quoted below, it is clear that multiple clients sharing control over a given resource is not disclosed, as it appears the final Office Action seems to allege. There simply is no second client disclosed in Martenson.

Against the downloading/sharing aspect of claim 4, the final Office Action cites to Martenson at column 10, lines 30-45. However, the cited section merely speaks to passwords, security, and the different levels of access to a resource that can be given. There is no disclosure whatsoever regarding sharing, much less sharing three-dimensional model data representing a terminal device.

Therefore, Applicant submits that claim 4 cannot be anticipated by, or made obvious over, Martenson.

Claim 6 recites that one of the first and second clients is a computer at a customer support center that supports the terminal device.

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Against claim 6, the final Office Action cites to Martenson at column 13, lines 20-29. However, the cited section of Martenson merely discloses fault/status reporting. There is no disclosure, teaching or suggestion of a client being a computer at a customer support center supporting a terminal device, as claimed.

Therefore, Applicant submits that claim 6 cannot be anticipated by, or made obvious over, Martenson.

Claim 7 recites a control server for a terminal device. The control server comprises a terminal device operation control program, for exchanging terminal device control data with a terminal device coupled to the control server, and for controlling the operation of the terminal device. The control server further comprises three-dimensional model data, comprising geometrical data representing the terminal device and terminal device operating data received from the terminal device reflecting operating results of the terminal device, and a module, for recording an operation on the terminal device performed by a user as an operation event and for replaying, as needed, the operation event.

Against the aspect of three-dimensional model data comprising geometrical data representing the terminal device, the Office Action cites to Martenson at column 16, line 65 to column 17, line 3.

However, the cited section discloses a three-dimensional view of the system as a whole (not a terminal device) in order to check system operation (not remotely control a terminal device). Moreover, the purpose of the view (to check system operation) can be satisfied with a simple network graph. Doing so in three dimensions adds nothing for the purpose. Yet, in the present application, such a view assists in remote control. This is the only mention of "three-dimensional" Applicant could find in the entirety of Martenson, and there is no disclosure therein regarding remotely controlling any portion of the system using the system view. Thus, Applicant submits Martenson fails to disclose, teach or suggest three-dimensional model data comprising geometrical data representing a terminal device, as claimed in claim 7.

Against the claim 7 aspect of a module for recording an operation on the terminal device that can be replayed, the Office Action first cites to Martenson at column 5, lines 31-34. This first section of Martenson discloses a controller for, among other things, maintaining fault logs and call traffic logs. However, Applicant submits that logs are simply different from a recording of an operation on a terminal device that can be replayed. Applicant submits that viewing logs does not replay the operation that created the log to begin with. Against the recording/replay aspect of claim 7, the Office Action next cites to Martenson at column 6, line 6. However, that section discloses monitoring rack modem connections, logging the data and reporting fault events. Again, Applicant submits that logging and reporting do not allow for replaying the operation that is being logged or reported.

Moreover, Applicant submits that viewing a two-dimensional log is simply not the same as replaying an operation terminal device, much less doing so with three-dimensional model data (the operation is recited in claim 1 as updating three-dimensional model data).

Therefore, Applicant submits that claim 7 cannot be anticipated by, or made obvious over, Martenson.

Claim 8 recites that the module employs recording/replaying software to record, as a VRML operation event, an operation performed by a user on the terminal device that is generated via a VRML browser, and replays and displays the VRML operation event via the VRML browser.

Against the VRML record/replay aspect of claim 8, the final Office Action cites to Martenson at column 5, lines 31-34 and column 6, line 6. However, the cited sections of Martenson disclose data and fault logging. Applicant submits that looking at a two-dimensional log is simply not the same as recording and replaying an operation on a terminal device as a VRML event (necessarily three-dimensional).

Therefore, Applicant submits that claim 8 cannot be anticipated by, or made obvious over, Martenson.

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Claim 14 recites a terminal device sharing method, for sharing among a plurality of clients information concerning a terminal device. The method comprises employing a web browser at a first client to designate a URL corresponding to the terminal device, and downloading model data representing the terminal device. The method further comprises rendering the model data that are downloaded, updating the rendered model data by the first client, and transmitting the updated model data, the updated model data representing an operation on the terminal device, employing a web browser at a second client to designate the URL, downloading the model data, and receiving the updated model data at the second client.

Against the claim 14 aspect of downloading model data representing a terminal device, the Office Action cites to Martenson at column 4, lines 1-33. The cited section discloses downloading an options database to a client. As noted in Martenson at column 4, lines 15-16, the options are associated with operations to perform at the network resource. However, nowhere in the cited section does Martenson disclose downloading model data representing a terminal device, as claimed. The "view" referenced in Martenson at column 4, line 32 is simply a refreshed listing of the updated options and has nothing whatever to do with model data representing a terminal device.

Against the claim 14 aspect of rendering the downloaded model data, the Office Action again cites to Martenson at column 4, lines 1-33. As remarked above, Applicant submits that no modeling data is disclosed in Martenson, thus, there can be no disclosure to do anything with such data, let alone rendering such model data. The same is true for the claim 1 aspect of updating the rendered model data.

Therefore, Applicant submits that claim 14 cannot be anticipated by, or made obvious over, Martenson.

<center>CONCLUSION</center>

Applicant submits that the dependent claims not specifically addressed herein are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

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For all the above reasons, Applicant maintains that the claims of the subject application are patentable over the cited art, and earnestly requests allowance of claims 1-20.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicant's undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,

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